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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

NOLAN SALIX; COTTONWOOD
ENVIRONMENTAL LAW CENTER,

Plaintiffs,

vs.

UNITED STATES FOREST SERVICE;
FAY KRUEGER, in her official capacity
as Regional Forester for the U.S. Forest
Service, Region One,

Defendants

CV 12-45-M-DLC

DECLARATION OF
SARA JANE JOHNSON, Ph. D.

I, Sara Jane Johnson, hereby declare as follows:

1. I submit this declaration in support of Plaintiff's Complaint for Declaratory and Injunctive Relief and Plaintiff's Motion for Summary Judgment. I have personal knowledge of the matters stated herein, and if called as a witness, would and could competently testify thereto.
2. I am currently a resident of Three Forks, Montana and have been a member of Cottonwood Environmental Law Center ("CELC") since 2010.
3. I have a strong interest in the management of wildlife on public forest lands. This interest is based on my years of education, training and professional experience. I obtained a bachelor's and masters degree in biology at the University of South Dakota in 1967 and 1969, and a Ph.D in biology at Montana State University in 1974. I worked as a wildlife biologist for the U.S. Forest Service in Montana and Idaho from 1974 into 1988. During those 14 years I was extensively involved in wildlife habitat planning in areas where logging was planned. As a part of this work, I completed various monitoring efforts regarding logging impacts on wildlife species ranging from small mammals and birds to big game species. This interest is also based on my recreational interests as a lifelong hiker, wildlife watcher an outdoor enthusiast who enjoys these activities on numerous public forest lands throughout Montana and Idaho.

1 4. Over the past 20 years, I have spent countless hours hiking and recreating in
2 National Forests across Montana, many of which include areas of designated
3 critical habitat for the threatened lynx. This includes the following activities and
4 areas:
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- 6 • Hiking, taking pictures and looking for wildlife, including lynx, in the
7 Gallatin National Forest in southwest Montana, specifically in the
8 East Boulder and Hyalite Project areas of this forest.
- 9 • Visiting and recreating in the Colt Summit Project Area near Seeley
10 Lake in the Lolo National Forest.
- 11 • Hiking, skiing and looking for wildlife, including lynx in the Flathead
12 National Forest in northwestern Montana.
- 13 • Hiking and looking for wildlife, including lynx, in the Helena
14 National Forest.
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16 5. I enjoy visiting these areas of the National Forests, and I use them on a
17 continuing and ongoing basis. My strong interest in wildlife protection and forest
18 management dictates that I will continue these activities, and I have every intention
19 of returning to these and other areas of lynx critical habitat. I have concrete plans
20 to return to these forests, and critical habitat contained within them, during the
21 spring and summer of 2013.
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23 6. The government's failure to re-initiate consultation under the ESA on its
24 programmatic planning document for numerous National Forests is a significant
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procedural violation that negatively affects my scientific, recreational and aesthetic interests.

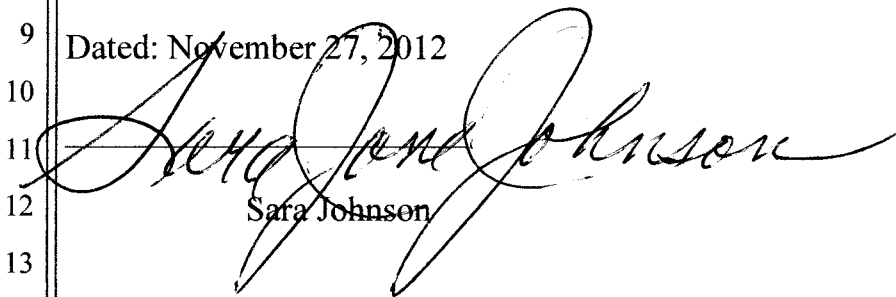
7. The government's failure to consult means that we do not know what effect the government's management activities, such as logging, are having on areas of lynx critical habitat. I have serious concerns that the government's violation of the law will have serious impacts to lynx critical habitat at the landscape level, including the widespread destruction of lynx habitat and habitat for the snowshoe hare. If this happens, I will suffer scientific, recreational and aesthetic injuries because my chances of seeing a lynx in the wild will be significantly diminished. These are actual concrete injuries. If the government re-initiated consultation and determined its programmatic management direction will result in adverse modification of lynx critical habitat at the landscape scale, it may determine that the NRLA is not appropriate for guiding management activities. Because the agency has not made the determination, it has broken the law. The violation threatens my concrete interests.

8. My personal, recreational and conservation interests, as well as those of CELC and its members will be harmed if the government does not re-initiate consultation as required by the ESA. My ability, and other CELC members' ability, to see and enjoy lynx will be adversely impacted as a result of the above-named injuries.

1 9. Unless these injuries are redressed, myself, CELC, its members and the
2 general public will suffer substantive harm.
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5 I declare under penalty of perjury that the foregoing is true and correct to the best
6 of my knowledge.
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9 Dated: November 27, 2012

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12 Sara Johnson
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Declaration of Sara Jane Johnson.